

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

DEANDRE BRADLEY	)	
	)	
Plaintiff,	)	Case No. 1:23cv5020
	)	
v.	)	District Judge Sara L. Ellis
	)	
RONALD HAIN et al.,	)	
	)	
Defendants.	)	

**KANE COUNTY DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S AMENDED  
COMPLAINT**

NOW COME defendants Ronald Hain, Kane County, and Corrections Officers Anthony Keaty, Scott McKanna, Mergim Azemi, Joel Directo, Luis Aguirre, Scott Flowers and Perparim Osmani by Kane County State's Attorney Jamie L. Mosser through her assistants Vincent Coyle Elizabeth Tabor, and Erin M. Brady, pursuant to Fed. R. Civ. P. 12(b)(6), and move that this Honorable Court dismiss Plaintiff's First Amended Complaint against them. In support of such Motion, the Kane County Defendants submits their accompanying Memorandum of Law in Support.

Respectfully submitted,  
Defendants Sheriff Hain, Kane County, C/O Keaty,  
C/O McKanna, C/O Azemi, C/O Directo, C/O  
Aguirre, C/O Flowers and C/O Osmani.  
By: /s/ Vincent Coyle  
One of Their Attorneys

Jamie L. Mosser  
Kane County State's Attorney  
Erin M. Brady  
Elizabeth Tabor  
Vincent Coyle  
Assistant State's Attorneys  
100 South Third Street, 4<sup>th</sup> Floor  
Geneva, Illinois 60134  
Atty. No.: 6303106